

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

: Hon. Robert B. Kugler

:

: Civil No. 1:19-md-2875-RBK-

: JS

This Document Relates to:

:

All Actions

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**NOTICE OF AUROBINDO PHARMA LTD.'S MOTION FOR
PROTECTIVE ORDER REGARDING THE DEPOSITION OF DR. RAM
MOHAN RAO AND PRODUCTION OF HIS CUSTODIAL FILE**

To: Adam M. Slater, Esquire
Mazie Slater Katz & Freeman
103 Eisenhower Parkway
Suite 207
Roseland, NJ 07068

PLEASE TAKE NOTICE that on a date to be decided after March 16, 2021, Aurobindo Pharma Ltd., by and through its undersigned counsel, shall move before the Honorable Special Master Thomas I. Vanaskie, for an ORDER precluding the deposition of Dr. A Ram Mohan Rao and precluding the production of his custodial file.

Respectfully submitted,

Date: March 16, 2021


Jessica M. Heinz, Esq.
CIPRIANI & WERNER

CIPRIANI & WERNER

450 Sentry Parkway, Suite 200
Blue Bell, PA 19433
*Attorneys for Aurobindo Pharma
USA, Inc., Aurolife Pharma, LLC, and
Aurobindo Pharma, Ltd.*